



UNITED STATES OF AMERICA
Federal Trade Commission
Washington, D.C. 20580

December 7, 2023

VIA ECF

Hon. Edgardo Ramos
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: Federal Trade Commission v. IQVIA Holdings Inc. and Propel Media, Inc., 1:23-cv-06188-ER

Dear Judge Ramos:

Pursuant to this Court's Rule of Individual Practice 3(ii) and Paragraph 10 of the Protective Order, Dkt No. 153 (the "Amended Protective Order"), the Federal Trade Commission ("FTC") respectfully submits this letter-motion seeking an Order sealing the FTC's Proposed Findings of Fact and Conclusions of Law ("FOF/COL"). Pursuant to the Court's guidance, we are filing the FTC's FOF/COL completely under seal, with ultimate unsealing for information for the public record to follow in a couple of weeks. *See* 12/1/23 Hr'g. Tr. at pp. 1342-1343. Accordingly, the FTC will prepare a redacted version of the FTC's FOF/COL, with redactions limited to the information designated as Confidential Information, which will be filed publicly in the coming weeks.

The FTC respectfully request that this letter-motion be granted in its entirety and an Order be issued sealing the FTC's FOF/COL.

Respectfully submitted,

/s/ Jennifer Fleury
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cc: All Counsel of Record (via ECF)